



Geomatrix

March 17, 2008
Project No. 13636

Mr. J. Ryan Benefield, P.E.
Chief, Hazardous Waste Division
Arkansas Department of Environmental Quality
8001 National Drive
Little Rock, Arkansas 72219-8913

Subject: Seventh Monthly Status Report (February 1 to 29th, 2008)
Cedar Chemical Company Facility ("the Site")
Helena-West Helena, Arkansas
State EPA ID No. ARD990660649

Dear Mr. Benefield:

On behalf of ExxonMobil Chemical Company, a Division of Exxon Mobil Corporation and Helena Chemical Company, which comprise the Cedar Chemical Corporation Joint Defense Group ("the Group"), Geomatrix submits this letter constituting the Seventh Monthly Status Report (February 1 to 29th, 2008) summarizing our work efforts. This status report is being submitted under the scope of work and schedule presented to the Arkansas Department of Environmental Quality (ADEQ) on August 8, 2007. Summarized below are the activities completed in February 2008 and the activities planned for the site in March 2008.

Specific Work Completed in February 2008

General Site Activities

- There were no site activities performed in February, 2008.

Site Investigation Work Plan

- On January 18, 2008, the Facility Investigation (FI) Workplan was submitted to ADEQ outlining the procedures to fill the supplemental data needs identified in the CCR. The FI Workplan included a schedule for conducting the Site Investigation and completing the Site Investigation Report.
- ADEQ provided comments to the FI Workplan on February 4, 2008.
- On February 12, 2008, the Group met with ADEQ to discuss the FI Workplan comments and other administrative issues related to the site.



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- On February 22, 2008, the Group submitted a response to comments letter to ADEQ for the FI Workplan.
- As requested by Tammie Hynum of ADEQ, on February 29, 2008, the Group submitted a request for permission letter to leave one 55-gallon drum characterized as hazardous on-site past the 90-day regulatory limit. This drum will be managed with other waste generated at the site during the FI work. On February 29, 2008, the ADEQ approved this request to leave the waste on-site until July 31, 2008.

Site Investigation

- Following ADEQ approval of the response to comments letter submitted on February 22, 2008, the FI Workplan will be revised. Geomatrix will begin the site investigation in accordance with the schedule in the Site Investigation Workplan.

Site Investigation Report

- Following the completion of the site investigation, Geomatrix will submit the Site Investigation Report in accordance with the schedule in the Site Investigation Work Plan.

Feasibility Study

- Following ADEQ approval of the Site Investigation Report, Geomatrix will prepare and submit a Feasibility Study to identify a recommended site remedy.

Other Activities

- The Sixth Quarterly Status Report was submitted to ADEQ on February 11, 2008.

Work Planned for March 2008:

General Site Activities

- A pre-site visit is scheduled for March 5, 2008 with subcontractors who will perform the FI work and ADEQ.
- Geomatrix plans to meet with the County Judge of Phillips County to discuss work along the road within the Industrial Park, and with the Highway Department to gain permission to access the road easements along State Highway 242 for the site investigation.



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- Geomatrix will prepare to contact other adjacent landowners as necessary.

Site Investigation Work Plan

- The FI Workplan will be revised based on ADEQs approval to the response to comments letter submitted on February 22, 2008.

Site Investigation

- The site investigation is scheduled to begin on March 25, 2008.

Site Investigation Report

- No activities are planned in February. These activities will follow completion of the site investigation.

Feasibility Study

- No activities are planned in February. These activities will follow completion of the Site Investigation Report and approval by ADEQ.

Other Activities

- The Group reached an agreement in principle with the ADEQ staff on the language of a Separate Agreement. The Group tendered their signature pages to ADEQ in January.

Project Issues Pending:

- Site access to off-site adjacent properties. Ownership was established for the adjacent offsite properties. Geomatrix plans on meeting with the County Judge of Phillips County to discuss work along the road within the Industrial Park, and with the Arkansas Highway Department to gain permission to access the road easements along State Highway 242 for the site investigation.
- Geomatrix is working with Rufus Torrence of ADEQ and the City of Helena for disposition of the non-hazardous purge water currently stored onsite.



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Regulatory and Legal Issues Pending:

Order Provision V.16: Maintenance of Escrow:

- Completed.

Order Provision V.20: The Parties agree to negotiate in good faith to reach a separate agreement to conduct a Site investigation ("SI") and feasibility study as may be necessary.

- See comment above regarding the Separate Agreement.

Meetings and Conference Calls with ADEQ:

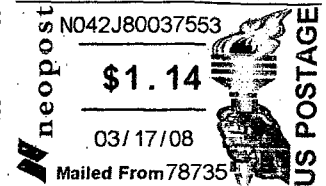
- On March 25, 2008, Geomatrix and ADEQ discussed FI field scheduling, waste management and comments to the FI Workplan. On March 11, 2008, ADEQ granted an extension to submit the final FI Workplan until March 20th, 2008.
- Telephone calls and electronic communication will occur as needed.

If you have any comments regarding this report, please call me at (512) 494-0333.

Sincerely,
GEOMATRIX CONSULTANTS, INC.

Kelly Beck, P.G.
Project Manager

cc: ExxonMobil Chemical Company, a Division of Exxon Mobil Corporation
Helena Chemical Company
Tyco Company Managers



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Austin, Texas 78735-8722

ADEQ001* 722093015 170713 03/31/09
NOTIFY SENDER OF NEW ADDRESS
ADEQ - Texas Department of Environmental Quality
5301 N SHORE DRIVE
NORTH LITTLE ROCK AR 72118-5317

Little Rock, Arkansas 72118-5317

